

**EXHIBIT L**

**TO DECLARATION OF MATTHEW D. BROWN  
IN SUPPORT OF FACEBOOK, INC.'S OPPOSITION  
TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

**[PUBLIC REDACTED VERSION]**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ANGEL FRALEY; PAUL WANG; SUSAN MAINZER; JAMES H. DUVAL, a minor, by and through JAMES DUVAL, as Guardian ad Litem; and WILLIAM TAIT, a minor, by and through RUSSELL TAIT, as Guardian ad Litem; individually and on behalf of all others similarly situated.

Plaintiffs,

V<sub>1</sub>

FACEBOOK, INC., a corporation; and DOES 1-100,

### Defendants.

**Case No. CV 11-01726 LHK PSG**

**PLAINTIFF JAMES H. DUVAL'S  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT'S  
INTERROGATORIES**

## SET ONE

Courtroom: 8

Judge: Hon. Lucy H. Koh

Trial Date: December 12, 2012

1 privileged communications or attorney work product; for purposes of these responses,  
2 “privileged” includes but is not limited to those documents protected by the attorney work  
3 product doctrine.

4 10. Plaintiff objects to the definition of “USERNAME” as the definition does not  
5 explain what that term means in the context of being a Facebook.com user. Plaintiff will  
6 interpret this to mean the email address by which plaintiff logs in or has logged in to Plaintiff’s  
7 facebook.com account.

8 9 Subject to the above objections, Plaintiff responds as follows:  
10  
11

12 **INTERROGATORY NO. 2:**

13 DESCRIBE the circumstances under which YOU have “Liked” any content (including,  
14 without limitation, a product, service, website, brand, organization, celebrity, musician, band,  
15 event, Facebook Page, or other content) on Facebook.com including, with respect to each piece  
16 of content “Liked,” the date(s) YOU “Liked” the content, a description of the content “Liked,”  
17 whether YOU “Liked” the content through FACEBOOK’s website or a third-party website, and  
18 all the reason(s) YOU “Liked” the content, including whether you “Liked” the content in order  
19 to inform your FACEBOOK Friends that you liked the content.  
20

21 **RESPONSE TO INTERROGATORY NO. 2:**

22 Plaintiff objects to this Interrogatory as compound and consisting of at least five  
23 subparts. Plaintiff objects to the lack of a time frame on grounds of relevance and undue  
24 burden. Plaintiff also objects to the Interrogatory as overbroad and unduly burdensome.  
25 Subject to those objections and the General Objections, Plaintiff responds as follows:  
26 Sometime on or before April 7, 2011, I clicked on a Facebook “Like” button found on the  
27  
28

1 facebook.com page for PopCorners. I did this to get a special offer code, not because I had an  
2 affinity for PopCorners. See Exhibit 5 to the Second Amended Complaint, a true and correct  
3 copy of a printout of the page on May 4, 2011, similar to the one which caused me to click on  
4 the Facebook Like button. I cannot recall specific other items I may have employed the  
5 Facebook "Like" button at this time, or the reasons for doing so. However, I have generally  
6 used the "Like" button for one of the following reasons: I enjoy a particular musical artist or  
7 actor, or it is someone I know personally and want to support him or her or them; I click the  
8 "Like" button to support a friend's post or action; With regard to companies, I often click the  
9 "Like" button because I am required to do so if I want to see something offered, such as more  
10 information, photos, or coupons.  
11

12 A list of the specific items I "liked" on Facebook, arranged by category, is attached as  
13 Exhibit 1 hereto. The times for each cannot be determined from the available information.  
14

15 **INTERROGATORY NO. 6:**

16 IDENTIFY all other social networking or interactive sharing websites (including,  
17 without limitation, MySpace Friendster, Google+, YouTube, Yelp, LinkedIn, Twitter, Pandora,  
18 Foursquare, Flickr, Etsy, SoundCloud, Tumblr, Blogspot, Wordpress, Blogger) on which YOU  
19 have or have had an account or membership, including the date on which YOU signed up with  
20 each such website and all use IDs, user names, and/or e-mail addresses associated with each  
21 such account.  
22

23 **RESPONSE TO INTERROGATORY NO. 6:**  
24

1 **RESPONSE TO INTERROGATORY NO. 15:**

2 Plaintiff objects to this Interrogatory as irrelevant, not reasonably calculated to lead to  
3 the discovery of admissible evidence, and calling for private information of third parties.  
4 Subject to and without waiving those and the general objections, Plaintiff responds: Mr.  
5 Duval's guardian does not have a Facebook account.  
6

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10 VERIFICATION (Standard) FRCP 33(b)(1), (2)

11  
12 I declare that:

13  
14 I am the plaintiff in the above-entitled action; I am familiar with the contents of the following:

15 **Plaintiff James Duval's Supplemental Responses to Defendant's Interrogatories, Set**  
16 **One**

17  
18 The information supplied therein is based on my own personal knowledge and/or has been  
19 supplied by my attorneys or other agents and is therefore provided as required by law. The  
20 information contained in the foregoing document(s) is true, except as to matters which were  
provided by my attorneys or other agents, and, as to those matters, I am informed and believe that  
they are true.

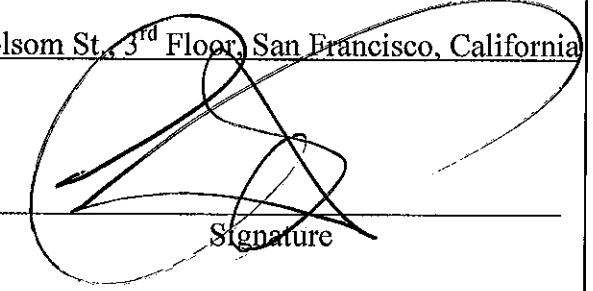
21  
22 I declare under the penalty of perjury under the laws of the State of California that the  
forgoing is true and correct and that this verification was executed on:

23  
24 December 12, 2011, at 515 Folsom St., 3<sup>rd</sup> Floor, San Francisco, California

Date

25  
26 James Duval

Name



Signature

# **EXHIBIT 1**



